

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$14,000 IN U.S. CURRENCY,

Defendant.

Civil Action No. 8:20-CV-1614(TJM/DJS)

**STATUS REPORT**

Pursuant to the Court's Order of January 25, 2022, Plaintiff provides the following status report.

This civil forfeiture case concerns \$14,000 in cash that government agents recovered from a GMC Yukon Denali on July 1, 2020. The cash was seized along with firearms and duffel bags containing marijuana. Claimant Keith Bass alleges an interest in, and ownership of, the \$14,000. Bass is also a defendant in the related criminal case, *United States v Washington & Bass*, Docket No. 8:20-CR-185 (TJM) in which the defendants are charged with possessing a firearm in furtherance of a drug trafficking crime and possessing controlled substances with the intent to distribute.

The next step in this case, is for the parties to conduct a Rule 16 conference to meet and confer about the needs for civil discovery and to provide their views on a scheduling order to the Court. However, as the parties have represented, Bass' right against self-incrimination is potentially burdened if he participates in civil discovery. See 18 U.S.C. § 981(g)(2) (the Court "shall" stay a civil forfeiture proceeding if a claimant's right against self-incrimination is burdened.")).

Given that claimant Keith Bass is now *pro se* in this case, Doc. #28, and his criminal trial is set for June 6, 2022, the United States respectfully suggests that this case remain stayed so as not to burden Mr. Bass while he is preparing for his criminal trial, or potentially jeopardize his Fifth Amendment Rights. The United States proposes that the Court order the parties to file a status report on or before June 17, 2022, addressing how the parties propose to proceed in light of whatever results come from Mr. Bass's criminal trial.

Respectfully submitted,


CARLA B. FREEDMAN  
United States Attorney

Dated: 4/5/22

By: /s/Christopher R. Moran  
Christopher R. Moran  
Assistant United States Attorney  
Bar Roll No.: 700767

**Pursuant to status report, it is SO ORDERED. This matter is STAYED. The parties shall submit a status report on, or before June 17, 2022.**

Dated: April 11, 2022

  
HON. THOMAS J. MCAVOY  
SENIOR UNITED STATES DISTRICT COURT JUDGE